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Attorneys for Defendant

ROWLAND MARCUS ANDRADE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROWLAND MARCUS ANDRADE,

Defendant.

Case No. 3:20-cr-00249-RS

**DEFENDANT ANDRADE'S WITNESS
LIST**

Pretrial Conference: Jan. 22, 2025 | 9:30 a.m.

Trial: Feb. 10, 2025 | 9:00 a.m.

Court: Courtroom 3 | 17th Floor

Judge: Hon. Richard Seeborg

Defendant Andrade hereby submits his list of witnesses that may be called to testify during his case-in-chief during the trial of the above-captioned matter. Mr. Andrade reserves the right to call any witness listed on the government's witness list. Mr. Andrade further respectfully reserves the right to amend this list and disclose additional witnesses in a manner consistent with the Federal Rules of Criminal Procedure. Not listed here, because they have already been disclosed, are his expert witnesses.

1. Anticipated Case-In-Chief Witnesses

ID #	Name
1	Allaham, Joey
2	Cully, Warren
3	Davis, Barry
4	Fahy, John
5	Gregory, Amanda
6	Grimm, Bradford
7	Johnson, Kathy (potential summary witness)
8	Korf, Mordechai
9	Lee, Bryant (UCE 7410)
10	Lee, Christine
11	Martinez, Christopher
12	OCE 8026-SAC
13	Petkevich, Sergey
14	Poon, Terrence
15	Pugliese, Dylan
16	Ray, Christopher
17	Ruzicka, Karl
18	Takhar, Jasbir
19	Tinker, Jeffrey
20	Torres, Raul
21	Weissman, Arthur
22	Wooten, Randy

2. Anticipated As-Needed Impeachment Witnesses

ID #	Name
23	Fein, Brian
24	Ferrara, Peter
25	Hodges, Kelly
26	Koltuniak, Andrew
27	Kroll, Chase
28	Motley, Seaton
29	Quinn, Ethan
30	Rothschild, Beau
31	Sherman, Steve
32	Wong, Bryan
33	Wynar, Rohan
34	Zicherman, Eli

3. Anticipated As-Needed Foundation and Authenticity Witnesses (Should the Parties Fail to Stipulate)

ID #	Name
35	Ahmed, Leena (UCE 7780)
36	Apollaro, Anthony
37	Armas, Elizabeth
38	Battle, Wes
39	Bierbauer, Erik
40	Clachko, Jeffrey
41	Danik, Jeffrey
42	Di Paolo, Paul
43	Donahoe, Brian
44	Fliderman, Sandy
45	Genao, Ana
46	Gupta, Ravi
47	Haljun, Gibbs
48	Kahrs, James

49	Landau, Robert
50	Lee, Bryant
51	Lehmberg, Emily
52	Maran, Cory
53	McCormack, Mike
54	McKenna, Mary
55	Melville, Ann
56	Migdall, Allan
57	Morgan, Brad
58	O'Brien, David
59	Oriji, Nddi
60	Prasievi, Alexander
61	Randall, John
62	UCE-7780
63	Woods, James

4. Anticipated As-Needed Witnesses Should Evidence of Alleged Market

Manipulation, Prior Litigation, and AtenCoin be Admitted over Mr. Andrade's objection.

ID #	Name
64	Agrawal, Sachin
65	Clay, Jerrell
66	Cohen, David
67	Fulton, Patricia
68	Getz, George
69	Gray, Richard
70	Kresek, Barbara
71	Olsen, Eric
72	Verma, Nea
73	Westerfield, Lee

Respectfully submitted,

DATED: January 22, 2025

KING & SPALDING LLP

By: /s/ Michael J. Shepard
MICHAEL J. SHEPARD
KERRIE C. DENT
CINDY A. DIAMOND

Attorneys for Defendant
ROWLAND MARCUS ANDRADE